



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

BGK:TRP
F. #2023R00352

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 26, 2025

By ECF

The Honorable Allyne R. Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Taesung Kim
Criminal Docket No. 23-191 (ARR)
Proposed Sale of 1622 Parker Avenue, Fort Lee, New Jersey, 07024

Dear Chief Judge Ross:

The government respectfully submits this letter and the enclosed proposed Stipulation and Order on behalf of the parties, for the Court's consideration and approval. The proposed Stipulation and Order seeks authorization for an interlocutory private sale of real property subject to forfeiture in order to avoid dissipation of the property and to maximize the value thereof.

On or about February 6, 2025, the Court entered a Preliminary Order of Forfeiture against the defendant forfeiting, *inter alia*, all title, right and interest in the real property and premises located at 1622 Parker Avenue, Fort Lee, New Jersey, 07024 (the "Subject Property") pursuant to 18 U.S.C. §§ 982(a)(1), and 982(b)(1) and 21 U.S.C. § 853(p) (ECF No. 69).

The defendant has advised the government that he has secured a buyer for the Subject Property. The proposed Stipulation and Order authorizes the defendant to sell the Subject Property in a private sale and remit the net proceeds of the sale to the United States Marshals Service to hold pending further order of this Court. Accordingly, the parties respectfully request that the Court "so order" the proposed Stipulation and Order pursuant to Rule 32.2(b)(7) of the Federal Rules of Criminal Procedure.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

JOSEPH NOCELLA, JR.
United States Attorney

By: /s/ Tanisha Payne
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cc: Counsel of Record